

February 10, 2000

Terry Dressler, Manager
Major Source Division
Santa Barbara County APCD
26 Castilian Drive B-23
Goleta, CA 93117

Dear Mr. Dressler:

EPA appreciates the opportunity to review the District's proposed Title V permit for Celite Corporation in Lompoc. Our main concern on this proposed permit is on inadequacy of periodic monitoring for NOx emissions from two emission units. From the discussions among our and your staff, we understand that the proposed permit will be revised to require more frequent monitoring on those sources to address our concerns. We also have a few comments and suggestions for your consideration.

If you have any questions regarding these comments please contact Bob Baker of my staff at (415) 744-1258.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division

Enclosure

cc: Brian Shafritz, SBAPCD
Ray Menebroker, CARB
Patrice Surmeier, Celite Corporation

Enclosure

Comments on the Proposed Title V Permit for Celite Corporation, Lompoc Plant

1. Adequacy of Periodic Monitoring for Group #1 Equipment

More frequent periodic monitoring for Boiler #1 and Silicate Plant Conveyor Dryer is necessary to ensure compliance with the NO_x emission limits.

The proposed permit Condition C.11(a) states that at least one item from each equipment group listed in Table 9.C.11.a shall be source tested biennially. Since Group #1 has a total of five pieces of equipment, the proposed permit condition, in effect, only requires that each piece of equipment be source tested once every ten years. Except for two sources in Group #1, TSP is the pollutant to be tested in these groups. However, the permit does provide for monitoring of TSP related parameters such as opacity and pressure drop across a baghouse.

The proposed permit also requires that two pieces of equipment (Boiler #1 and Silicate Plant Conveyor Dryer) be tested for NO_x emissions. However, the permit would only require source testing for NO_x emissions from Boiler #1 and the Silicate Plant Conveyor Dryer once every ten years. This frequency does not adequately ensure compliance with the NO_x emissions limits. Although an annual tune-up is required under District Rule 342 for these units, the tune-up will only address CO emissions and not NO_x emissions. Therefore, the permit must require more frequent monitoring of NO_x emissions from these pieces of equipment. We recommend that the District specify biennial source testing for NO_x emissions from both of these units.

2. Periodic Monitoring for SO_x Emissions

We realize that the District has done a significant amount of work to demonstrate that a good correlation exists between the sulfur content of the incoming raw material with the SO_x emissions from the process lines. We concur with the District's approach on this method of periodic monitoring of SO_x emissions from the five process lines. However, should the testing protocol, including the calculation procedures, change from the approved protocol, a permit modification requiring EPA review will be necessary.

3. Visible Emissions Monitoring for the CHEAFs and the HEV

We noted that the permit requires Celite to make daily visible emissions observations on all operating baghouses as well as taking a quarterly Method 9 or Method 22 visible emissions reading. However, Celite is only required to take a quarterly Method 9 reading

from each of the CHEAF and HEV stacks even though they may be the largest particulate sources at the facility. EPA recommends that the permit be amended to require Celite to make daily visible emissions observations of the CHEAF and HEV stacks as well as on all of the operating baghouses.

4. Suggestions for Clarification and Corrections

Please use a clear requirement for timing of various activities. For example, be more specific about the “deadlines” listed under Condition C.11(f). Since for this facility numerous schedules exist, you may consider adding a summary table that contains the schedules/deadlines associated with all specific actions such as submittal of test protocols, conducting of tests, and submittals of various reports or requests, to clearly show when all requirements are due.

Please correct numerous referencing errors throughout the document. Also, please note that some attachments (e.g., Attachment 10.5) were either blank and/or they referred to other parts of the permit. You may want to remove them. A few examples of incorrect references follow: Reference to:Table 4.2 on page 6, Attachment 10.7 under item 1.6.4, Attachment 10.1 in Attachment 10.2, Attachments 10.6 and 10.7 under item 2.6.